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11 *Attorneys for Plaintiff, Deutsche Bank National Trust Company, Formerly Known as Bankers
12 Trust Company of California, N.A., as Trustee for American Home Mortgage Investment Trust
13 2005-2*

14 **UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA**

16 DEUTSCHE BANK NATIONAL TRUST
17 COMPANY, FORMERLY KNOWN AS
18 BANKERS TRUST COMPANY OF
19 CALIFORNIA, N.A., AS TRUSTEE FOR
20 AMERICAN HOME MORTGAGE
21 INVESTMENT TRUST 2005-2,

22 Plaintiff,

23 vs.

24 FIDELITY NATIONAL TITLE GROUP,
25 INC.; FIDELITY NATIONAL TITLE
26 INSURANCE COMPANY;
27 COMMONWEALTH LAND TITLE
28 INSURANCE COMPANY; DOE
INDIVIDUALS I through X; and ROE
CORPORATIONS XI through XX, inclusive,

Defendants.

Case No.: 2:20-cv-01885-APG-VCF

**STIPULATION AND ORDER TO
EXTEND TIME PERIOD TO RESPOND
TO COMMONWEALTH LAND TITLE
INSURANCE COMPANY'S
OPPOSITION TO COUNTERMOTION
FOR PARTIAL SUMMARY
JUDGMENT [ECF No. 36]**

[Second Request]

23 Plaintiff, Deutsche Bank National Trust Company, Formerly Known as Bankers Trust
24 Company of California, N.A., as Trustee for American Home Mortgage Investment Trust 2005-
25 2 ("Deutsche Bank") and Defendant, Commonwealth Land Title Insurance Company
26 ("Commonwealth"), by and through their attorneys of record, hereby stipulate and agree as
27 follows:
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1. On September 23, 2020, Deutsche Bank filed its Complaint in the Eighth Judicial
2 District Court, Case No. A-20-821781-C [ECF No. 1-1];
 3. On October 8, 2020, Commonwealth filed a Petition for Removal to this Court [ECF
4 No. 1];
 5. On October 13, 2020, Commonwealth filed a Motion to Dismiss [ECF No. 4];
 6. On November 30, 2020, Deutsche Bank filed an Opposition to Commonwealth's
7 Motion to Dismiss and Counter motion for Partial Summary Judgment [ECF Nos. 24
8 and 25];
 9. On December 21, 2020, Commonwealth filed its Reply in Support of its Motion to
10 Dismiss and Opposition to Counter motion for Partial Summary Judgment [ECF No.
11 36];
 12. Deutsche Bank contends that it is entitled to file a response to Commonwealth's
13 Opposition to its Counter motion for Partial Summary Judgment and that its deadline
14 to do so is January 11, 2021 [ECF No. 40];
 15. In light of the recent holidays, Deutsche Bank's counsel is requesting a brief
16 extension to respond to Commonwealth's Opposition, until January 19, 2021;
 17. This extension is requested to allow counsel for Deutsche Bank additional time to
18 review and respond to the points and authorities cited to in the pending Opposition;
 19. Counsel for Commonwealth does not oppose the requested extension to the extent
20 that a response is permitted;

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1 10. This is the second request for an extension which is made in good faith and not for
2 purposes of delay.

3 **IT IS SO STIPULATED.**

4 DATED this 8th day of January, 2021.

5 WRIGHT, FINLAY & ZAK, LLP

6 */s/ Lindsay D. Robbins*

7 Lindsay D. Robbins, Esq.
8 Nevada Bar No. 13474
9 7785 W. Sahara Ave., Suite 200
Las Vegas, NV 89117
10 *Attorneys for Plaintiff, Deutsche Bank*
11 *National Trust Company, Formerly Known as*
12 *Bankers Trust Company of California, N.A.,*
13 *as Trustee for American Home Mortgage*
14 *Investment Trust 2005-2*

DATED this 8th day of January, 2021.

SINCLAIR BRAUN LLP

/s/ Kevin S. Sinclair

Kevin S. Sinclair, Esq.
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Encino, CA 91436
Attorneys for Defendants, Commonwealth
Land Title Insurance Company, Fidelity
National Title Group, Inc., and Fidelity
National Title Insurance Company

13 **IT IS SO ORDERED.**

14 DATED this 11th day of January, 2021.

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UNITED STATES DISTRICT JUDGE

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